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February 25, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

Re: EB Docket 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), enclosed for filing in the above-referenced docket is the executed annual CPNI Compliance Certificate of Least Cost Routing, Inc. Attached to the certificate is a summary of the company's CPNI policies and procedures.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Hudson'.

Paul B. Hudson
Counsel for Least Cost Routing, Inc.

Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: February __, 2011
2. Name of company covered by this certification: Least Cost Routing, Inc.
3. Form 499 Filer ID: 815111
4. Name of signatory: James C. Keeley
5. Title of signatory: Chief Accounting Officer and Interim CFO

Certification:

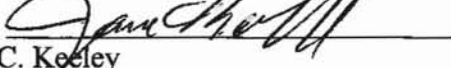
I, James C. Keeley certify that I was an officer of Least Cost Routing, Inc. at the time of its dissolution in 2010, and acting as an agent of the company, that I have personal knowledge that the company throughout its operating period in 2010 had established operating procedures that were adequate to ensure compliance with the Commission's CPNI rules set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensured that the company complied with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year, including any proceedings instituted in the courts or any state or federal regulatory agency. I am not aware of any processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.

Signed 
James C. Keeley
Chief Accounting Officer and Interim CFO
February 23, 2011

Statement of CPNI Procedures and Compliance

Least Cost Routing, Inc. ("LCR") does not use, disclose or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005, and at present does not use, disclose or permit access to CPNI for any marketing purposes at all. Nor does the Company allow affiliates or third parties access to CPNI for marketing-related purposes. If LCR elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 *et seq.*, including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. LCR will develop and implement an appropriate tracking method to ensure that customers' CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes. Outbound marketing situations, if any, are subject to supervisory/management review to ensure compliance with these rules, as necessary.

Consistent with the Commission's rules, LCR uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of LCR, other users, and other carriers from unlawful use; and (3) providing inside wiring, installation, maintenance, and repair services.

LCR does not currently market to customers that call and make inquiries concerning their account information. But should the Company choose to do so in the future, it will obtain a customer's oral authorization. LCR will also require each representative to provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

LCR has implemented procedures whereby it will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. In order to authenticate a customer's identity prior to disclosing CPNI, LCR authenticates the customer using a variety of methods. LCR has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant rules. LCR does not allow online access to CPNI.

LCR has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, LCR will notify affected customers. LCR will maintain a record of any CPNI-related breaches for a period of at least two years.

All LCR employees who have access to CPNI receive training about CPNI compliance. Specifically, a summary of LCR CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All LCR employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by LCR. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.